

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Lucinda Goodman	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 02-CV-3647
	:	
v.	:	
	:	
Parkway Mortgage, Inc., a Successor to	:	
Sammons Mortgage, Inc.; Midland National	:	
Life Insurance Co.; Parkway Mortgage,	:	
Inc.; Greenfield Liquidation Corporation;	:	
J. Brian Moran; Wachovia National Bank of	:	
Delaware as Successor in Interest to First	:	
Union National Bank; Interbay Funding,	:	
LLC; Mattleman, Weinroth & Miller,	:	
P.C.; and Richard W. Allgood, IFA	:	
	:	
Defendants	:	
	:	

**Request for Entry of Default Against J. Brian Moran  
and Greenfield Liquidation Corporation**

TO: Clerk  
United States District Court, Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

Please enter the default of defendants J. Brian Moran and Greenfield Liquidation Corporation for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure, as appears from the Certification of Robert H. Montgomery, Esquire, attached hereto.

Robert H. Montgomery, III, Esquire, P.C.

By: \_\_\_\_\_  
Robert H. Montgomery, III  
230 South Broad Street, Suite 1302  
Philadelphia, PA 19102  
(215) 731-1404

Attorney for Plaintiff

Dated: October 8, 2002

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Lucinda Goodman	:	
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Plaintiff,	:	CIVIL ACTION NO. 02-CV-3647
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Sammons Mortgage, Inc.; Midland National	:	
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J. Brian Moran; Wachovia National Bank of	:	
Delaware as Successor in Interest to First	:	
Union National Bank; Interbay Funding,	:	
LLC; Mattleman, Weinroth & Miller,	:	
P.C.; and Richard W. Allgood, IFA	:	
	:	
Defendants	:	
	:	

**Certification in Support of Request for Entry of Default Against J. Brian Moran  
and Greenfield Liquidation Corporation**

I, Robert H. Montgomery, of full age, do hereby make this Certification in lieu of oath or affidavit, in the within matter as follows:

1. I am an attorney-at-law of the Commonwealth of Pennsylvania and a member of the firm Robert H. Montgomery, III, Esquire, P.C., attorneys for plaintiff in the above-entitled action. I am thoroughly familiar with the facts and circumstances of this action. I make this Certification in support of plaintiff's request that the Clerk of the Court enter defaults against the defendants J. Brian Moran and Greenfield Liquidation Corporation in the above- entitled action.

2. The Complaint and Summons in this action were personally served on defendants J. Brian Moran and Greenfield Liquidation Corporation on July 12, 2002. The original Proof of Service and Summons were filed on August 21, 2002.

3. The time within which defendants J. Brian Moran and Greenfield Liquidation Corporation may answer or otherwise move as to the Complaint expired on August 1, 2002, and the defendants J. Brian Moran and Greenfield Liquidation Corporation have not answered or otherwise responded.

4. The time within which defendants may answer or otherwise respond has not been extended by stipulation.

5. Plaintiff has no alternative but to seek an Entry of Default. Plaintiff will be forwarding shortly to the Court an appropriate default judgment.

Robert H. Montgomery, III, Esquire, P.C.

By: \_\_\_\_\_  
Robert H. Montgomery, III  
230 South Broad Street, Suite 1302  
Philadelphia, PA 19102  
(215) 731-1404

Attorney for Plaintiff,  
Lucinda Goodman

Dated: October 8, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing paper(s) this October 8, 2002, on all counsel of record via regular mail:

Michael K. Sullivan, Esquire  
Blank, Rome, Comisky, & McCauley, LLP  
One Logan Square  
Philadelphia, PA 19103-6998

Robert J. Murtaugh, Esquire  
Harvey, Pennington, Cabot, Griffith & Renneisen, Ltd.  
Eleven Penn Center, 29<sup>th</sup> Floor  
1835 Market Street  
Philadelphia, PA 19103

Joseph A. Gembala, III, Esquire  
3235 W. Penn Street  
Philadelphia, PA 19129

Parkway Mortgage, Inc.  
359 James Street  
Morristown, NJ 07960

Greenfield Liquidation Corp.  
359 James Street  
Morristown, NJ 07960

J. Brian Moran  
359 James Street  
Morristown, NJ 07960

Mattleman, Weinroth & Miller, P.C.  
401 Route 70 East  
Cherry Hill, NJ 08034

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Robert H. Montgomery, III, Esquire

Dated: October 8, 2002